

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 18 B 23591  
Henry G Colquitt, Jr, ) HON. COX  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF OBJECTION**

To: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603;

Illinois Department of Revenue, P.O. Box 19023, Springfield, IL 62794, certified mail;

Illinois Department of Revenue, Bankruptcy Section, P.O. Box 19035, Springfield, Illinois 62794, via certified mail.

Anna Valencia, City Clerk, 121 N. LaSalle Street, Room 107, Chicago, IL 60602.

Please take notice that on March 18, 2019 at 9:00 a.m., I shall appear before the Honorable Judge Cox in Courtroom 680 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached objection; you may appear if you so choose.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he sent this notice and the attached objection on February 20, 2019, to:

The Chapter 13 Trustee listed above via electronic court notification;

To the creditors listed above via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Steve Miljus  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625

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	)	CHAPTER 13
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**OBJECTION TO CLAIM 9**

NOW COMES Henry G Colquitt, Jr, Debtor, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and hereby moves this Honorable Court to enter an Order regarding Claim 9; Debtor states the following:

1. That on August 21, 2018, the Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On October 22, 2018, this Honorable Court confirmed the Debtor's Chapter 13 Plan of reorganization.
3. That on January 16, 2019, the Illinois Department of Revenue filed Claim 9 in the total amount of \$3,390.59. The Illinois Department of Revenue scheduled \$2,683.37 as unsecured priority debt. Please see attached Exhibit A.
4. 2014 taxes owed to Illinois Department of Revenue were not due within three years of filing and were filed timely by the Debtor. As such, they do not meet the requirements of 11 U.S.C. § 507.
5. The total amount of unsecured priority debt owed to the Illinois Department of Revenue is \$72.64. The total amount of general unsecured debt owed to the IDOR is \$3,317.95.

6. For the foregoing reasons set forth in this Motion, Debtor respectfully requests this Honorable Court to sustain Debtor's Objection to Claim 9 filed by the Illinois Department of Revenue.
7. Debtor respectfully requests this Court to sustain the objection to Claim 9 and deem that Debtor owes the unsecured priority debt of \$72.64. The total amount of general unsecured debt owed to the IDOR is \$3,317.95.
8. Debtor has filed the instant case in good faith and is in a position to proceed with the Chapter 13 Plan of reorganization.

WHEREFORE, Henry G Colquitt, Jr, Debtor, respectfully requests this Honorable Court enter an Order:

- A. To sustain the objection to Claim 9 and deem that Debtor owes the Illinois Department of Revenue the unsecured priority debt in the total amount of \$72.64. The total amount of general unsecured debt owed to the IDOR is \$3,317.95; and
- B. For any such further relief as this Court deems fair and just.

Respectfully submitted,

/s/ Steve Miljus  
Attorney for the Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
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